

1 **DANIEL F. LIPPMANN, ESQ.**

2 Nevada Bar No. 11636

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8 *Attorney for Defendant*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 JONATHAN RISSE-SANTOS,

14 Defendant.

CASE NO: 2:21-mj-00283-EJY

**STIPULATION TO CONTINUE**  
**PRELIMINARY HEARING**  
**(Third Request)**

15 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
16 Acting United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel  
17 for the United States of America, and Daniel F. Lippmann, Esq., counsel for Defendant,  
18 JONATHAN RISSE-SANTOS, that the preliminary hearing presently scheduled for August 13,  
19 2021, be vacated and continued to a time convenient to the Court but no sooner than 60 days.

20 This Stipulation is entered into for the following reasons:

- 21 1. Counsels for the United States and Mr. Risse-Santos are in active negotiations and require  
22 more time to present and consider offers of resolution.
  - 23 2. To aid in these negotiations, counsel for Mr. Risse-Santos, has recently procured the  
24 services of a psychiatrist to prepare an evaluation. The psychiatrist will need additional  
25 time to review the discovery and conduct a proper interview with Mr. Risse-Santos and  
26 ultimately prepare a report.
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3. Daniel F. Lippmann will not have sufficient and adequate time to effectively and thoroughly prepare for preliminary hearing and present an appropriate defense in the above-captioned matter on the date currently set for preliminary hearing.
4. Mr. Risse-Santos is in custody and does not object to the continuance.
5. Furthermore, denial of this request for continuance could result in a miscarriage of justice.
6. The parties agree to the continuance.
7. This is the third request for a continuance.

The additional time requested by this stipulation is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

DATED this 22<sup>nd</sup> day of July, 2021

s/Bianca R. Pucci  
BIANCA R. PUCCI, ESQ.  
Assistant United States Attorney

s/Daniel F. Lippmann  
DANIEL F. LIPPMANN, ESQ.  
Nevada Bar No. 11636  
*Attorney for Defendant*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,

JONATHAN RISSE-SANTOS,  
Defendant.

CASE NO: 2:21-mj-00283-EJY

**ORDER**

Based on the Stipulation of counsel, good cause appearing therefore:

IT IS HEREBY ORDERED that the Preliminary Hearing currently scheduled on August 13, 2021, be vacated and continued to October 22, 2021 at the hour of 10:00 a.m., in Courtroom 3D.

DATED this 26th day of July, 2021.

  
Elayna J. Youchan  
U.S. Magistrate Judge